

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA

Kimberly Wright

Civil No. 1-18-bk-00373-HWV

Defendant(s)

Chapt:13

vs.

Lawrence V. Young, Esquire
CGA Law Firm; its Attorneys
135 North George Street
York, Pennsylvania 17401

Manchester Township

Plaintiff(s)

FILED
HARRISBURG, PA
2018 MAY -8 PM 12:56
CLERK
U.S. BANKRUPTCY COURT

REQUEST FOR STAY OF PROCEEDINGS

CGA Law Lawrence V Young Esquire Firm and it's Attorney's is a Debt Collector that is fully secured and their interest won't be at risk as a result of the stay, I respectfully request this Court to stay the proceedings of this case.

The Defendant occupies the home as a primary residence.

Attorney, Lawrence V. Young, Esquire, CGA Law Firm; its Attorneys has not provided "Exhibit's or Affidavit" of contractual responsibility Alleged, Debtor in this suit, "Hearsay", is not material fact to be presented. Ultimately, the claim is subject to dismissal if it lacks "factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged." Iqbal, 556 U.S. at 678.

The Defendant request the Honorable Judge to Stay these proceedings Pending the outcome of Defendant's Motion to Dismiss. A stay of the proceedings is appropriate here. The Court has discretionary authority to issue a stay pending the outcome of Defendants' motion to dismiss. See FED. R. CIV. P. 26(c); Petrus, 833 F.2d at 583D

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

KIMBERLY WRIGHT, prose
2536 EASTON BLVD #122
YORK, PA 17402

The action of the Plaintiff/Movant, Manchester Township is in dispute and is unfair and/or deceptive as it relates to the Defendant.

I respectfully request this Court to stay the proceedings of this case, I need to be personally present in court for a hearing that is currently scheduled for May 15th, 2018. I am unable to get off from a offsite-mandatory-work training. I will need to make arrangements with HR to be available to appear most reasonably after May 30, 2018.

Respectfully submitted this 8th day of May, 2018.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

KIMBERLY WRIGHT, prose
2536 EASTON BLVD #122
YORK, PA 17402



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Certificate of Service

I hereby certify that a copy of was sent by first class mail, postage pre-paid, upon the following listed below:

NO.: 1-18-bk-00373-HWV
Lawrence V. Young, Esquire
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135 North George Street
York, Pennsylvania 17401

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Manchester Township

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